

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

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In re:	Case No. 22-17461
Joanna L. Garrison	Chapter 13
Debtor(s)	

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**DECLARATION OF MAILING CERTIFICATE OF SERVICE**

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On 11/3/2022, I did cause a copy of the following document(s), described below:

Exhibit: Transmittal Letter

Notice of Motion

Certification in Support of Motion

Certification in Support of Motion

Statement as to Why No Brief is Necessary

Proposed Order

to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing matrix exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

I caused these documents to be served by utilizing the services of Stretto, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to Fed.R. Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if fully set forth herein.

Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been served electronically with the documents described herein per the ECF/PACER system.

DATED: 11/3/2022

/s/ Warren S. Jones, Jr.  
Warren S. Jones, Jr.  
Bar No. 003781980  
Law Office of Warren S. Jones, Jr.  
1 Trinity Lane  
Mount Holly NJ 08060-0000  
609-261-8400  
email@warrensjones.com

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

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In re:	Case No. 22-17461
Joanna L. Garrison	Chapter 13
Debtor(s)	

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**CERTIFICATE OF SERVICE DECLARATION OF MAILING**

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On 11/3/2022, I did cause a copy of the following document(s), described below:

Exhibit: Transmittal Letter  
Notice of Motion  
Certification in Support of Motion  
Certification in Support of Motion  
Statement as to Why No Brief is Necessary  
Proposed Order

were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing matrix exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above referenced document (s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of Service and that it is true and correct to the best of my knowledge, information, and belief.

DATED: 11/3/2022



Melissa Membrino  
c/o Stretto  
410 Exchange Ste 100  
Irvine, CA 92602  
(949) 222-1212  
[declaration@stretto.com](mailto:declaration@stretto.com)

I certify that on 11/3/2022, I caused a copy of the Exhibit: Transmittal Letter, Notice of Motion, Certification in Support of Motion, Certification in Support of Motion, Statement as to Why No Brief is Necessary and Proposed Order to be served by First Class United States Mail service, with adequate postage to ensure delivery to:

EXHIBIT

JCP&L	880 Pinewald Keswick Rd				Manchester Township NJ 08759-0000
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LAW OFFICE OF  
WARREN S. JONES, JR., L.L.C.

THE RED BARN  
1 TRINITY LANE  
MOUNT HOLLY, NEW JERSEY 08060

WARREN S. JONES, JR.

(609) 261-8400  
FAX. NO. (609) 261-5252

November 3, 2022

Sent via regular and certified mail

JCP&L

ATTENTION: Officer, Managing or General Agent  
or to any other agent authorized by appointment  
or by law to receive service of process  
880 Pinewald Keswick Rd  
Manchester Township, NJ 08759

Sent via UPS: 1ZF119000791509423

Jyun Park, Chief Legal Officer  
JCP&L  
76 South Main Street  
Akron, OH 44308

Re: Garrison, Joanna L.  
Case Number: 22-17461

Dear Sir or Madam and Mr. Park:

Enclosed please find a copy of the aforesaid debtor's Motion to Sanctions against JCP&L in Bankruptcy Case No. 22-17461.

**YOU SHOULD READ THESE PAPERS CAREFULLY AND DISCUSS THEM WITH YOUR ATTORNEY.**

If you have any questions, please contact our office.

Very truly yours,

*Warren S. Jones, Jr.*

Warren S. Jones, Jr.

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY  
**Caption in Compliance with D.N.J. LBR 9004-2(c)**

WARREN S. JONES, JR., ESQUIRE  
Bar #003781980  
Law Offices of Warren S. Jones, Jr., LLC  
1 Trinity Lane  
Mount Holly, NJ 08060  
(609) 261-8400  
(609) 261-5252 fax  
email@warrensjones.com

In re:  
**Joanna L. Garrison**

Case No.: **22-17461**  
  
Chapter: **13**  
  
Adv. No.:  
  
Hearing Date: **12/14/2022**  
  
Judge: **Michael B. Kaplan**

**NOTICE OF MOTION**

TO: JCP&L, 880 Pinewald Keswick Rd, Manchester Township, NJ 08759

JCP&L, 76 South Main Street, Akron, OH 44308

**PLEASE TAKE NOTICE** that on 12/14/2022 at 9:00 a.m., or as soon as the matter may be heard, the undersigned, attorney for Debtor(s), will move before the Honorable Michael B. Kaplan of the United States Bankruptcy Court at 402 E State Street, Courtroom 8, Trenton, NJ 08608 for the entry of an Order for Damages for Violations of the Automatic Stay.

**YOUR RIGHTS MAY BE AFFECTED. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one).**

If you do not want the court to grant this motion, or if you want the court to consider your views, you or your attorney must file with the clerk at the address listed above, a written response explaining your position no later than 7 days prior to the hearing date.

If you mail your response to the clerk for filing, you must mail it early enough so the court will receive it on or before 7 days prior to the hearing date.

You must also mail a copy of your response to the attorney listed above.

Dated: November 3, 2022

By: /s/ WARREN S. JONES, JR.  
WARREN S. JONES, JR., ESQUIRE  
Counsel for Debtor

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY  
**Caption in Compliance with D.N.J. LBR 9004-2(c)**

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In re:  
**Joanna L. Garrison**

Case No.: **22-17461**  
Chapter: **13**  
Adv. No.:  
Hearing Date: **12/14/2022**  
Judge: **Michael B. Kaplan**

**CERTIFICATION IN SUPPORT OF MOTION**

**FOR DAMAGES FOR VIOLATIONS OF THE AUTOMATIC STAY**

1. Debtor(s), **Joanna L. Garrison**, commenced this case on **September 21, 2022** by filing a voluntary petition for relief under Chapter 13 of Title 11 of the United States Bankruptcy Code.
2. The Court has jurisdiction over this contested matter under 28 U.S.C. §§ 1334(a) and 157(a) and the Standing Order of the United States District Court dated July 10, 1984, as amended October 17, 2013, referring all bankruptcy cases to the bankruptcy court. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2)(G). Venue is proper in this Court pursuant to 28 U.S.C. § 1408.
3. Pursuant to the Certificate of Notice (Doc 6), Creditor JCP&L (hereafter "Creditor") was mailed a Notice of Bankruptcy Filing (Form 309A) to 880 Pinewald Keswick Rd on 9/24/2022.
4. At or about 5:00 p.m. on November 2, 2022, Creditor's agent or employee reportedly attempted to terminate electricity service at the Debtor's home in violation of the automatic stay.

5. On November 3, 2022, Debtor and a representative from the Debtor's attorney's office conducted a conference call with Creditor wherein Creditor's representative accurately provided the case number but indicated the case "could not be verified."
6. Creditor's representative either could not or would not provide a corporate address for purposes of serving this instant motion.
7. On the same phone call, Creditor's representative (identified by Samantha ID No. 271629) after providing to Debtor the bankruptcy case number continued to indicate that disconnection of the Debtor's service could not be delayed unless a payment arrangement was approved and Creditor indicated a down payment would be required to facilitate any payment arrangement. The same Creditor's representative then asked if the balance could be paid to avoid the disconnection of service.
8. Creditor continued to insist that termination of electricity would not be postponed to investigate the automatic stay Order of the Bankruptcy Court.
9. After multiple attempts to have the Creditor's representative elevate the matter, another representative (Ashley ID No. 54162) confirmed the disconnection would be terminated.
10. Given the Creditor provided the case number on the aforesaid conference call and given the aforesaid mailing, Creditor's violation of the automatic stay are willful and deserving of sanctions.
11. This instant motion follows the foregoing events and it is unknown at this time if service will be disconnected prior to the date of the hearing in this matter.
12. Service of this motion is being made pursuant to the Rules of Court; however, it is noteworthy that a copy of this motion is being served upon Hyun Park who is, upon information and belief, the Chief Legal Officer of Creditor.
13. The aforesaid phone call alone exceeded 57 minutes.
14. This has caused Debtor great stress and anxiety.

15. I can represent that I often have trouble with utility companies that require debtors in bankruptcy to satisfy their corporate policy requirements beyond the notice provided by the Court; this case is no exception.

I certify that the foregoing statements by me are true. I understand that if any statement is willfully false, I am subject to punishment.

WHEREFORE, debtor(s) pray for an order against **JCP&L** and requiring said creditor to pay legal fees in the amount of \$900 for the costs of the time of the said phone call, drafting this motion, and appearance, if necessary, along with punitive damages, and for such additional or alternative relief as may be just and proper.

Dated: November 3, 2022

Signature: **/s/ WARREN S. JONES, JR.**  
**WARREN S. JONES, JR.**



UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY  
**Caption in Compliance with D.N.J. LBR 9004-2(c)**

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In re:  
**Joanna L. Garrison**

Case No.: **22-17461**  
Chapter: **13**  
Adv. No.:  
Hearing Date: **12/14/2022**  
Judge: **Michael B. Kaplan**

**CERTIFICATION IN SUPPORT OF MOTION**

**FOR DAMAGES FOR VIOLATIONS OF THE AUTOMATIC STAY**

1. Debtor(s), **Joanna L. Garrison**, commenced this case on **September 21, 2022** by filing a voluntary petition for relief under Chapter 13 of Title 11 of the United States Bankruptcy Code.
2. At or about 5:00 p.m. on November 2, 2022, Creditor's agent or employee attempted to terminate my electricity service at my home.
3. On November 3, 2022, I called my attorney's office who conferenced me in to a customer service representative at JCP&L.
4. The JCP&L representative accurately provided the case number but indicated the case "could not be verified."
5. The JCP&L representative indicated that the shut-off could not be stopped.
6. The aforesaid phone call was so long my lunch break was about to end so I had to disconnect from the conference call while I believe it continued without me.
7. This has caused me great stress and anxiety.

I certify that the foregoing statements by me are true. I understand that if any statement is willfully false, I am subject to punishment.

WHEREFORE, debtor(s) pray for an order against **JCP&L** and requiring said creditor to pay legal fees in the amount of \$900 for the costs of the time of the said phone call, drafting this motion, and appearance, if necessary, along with punitive damages, and for such additional or alternative relief as may be just and proper.

Dated: November 3, 2022

Signature: **/s/ Joanna L. Garrison**  
**Joanna L. Garrison**

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY  
**Caption in Compliance with D.N.J. LBR 9004-2(c)**

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In re:  
**Joanna L. Garrison**

Case No.: **22-17461**  
Chapter: **13**  
Adv. No.:  
Hearing Date: **12/14/2022**  
Judge: **Michael B. Kaplan**

### **STATEMENT AS TO WHY NO BRIEF IS NECESSARY**

In accordance with D.N.J. LBR 9013-1(a)(3), it is respectfully submitted that no brief is necessary in the Court's consideration of this motion, as it does not involve complex issues of law.

Dated: Thursday, November 03, 2022

**/s/ WARREN S. JONES, JR.**  
Warren S. Jones, Jr.  
Attorney for Debtor

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY  
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Chapter: **13**  
Adv. No.:  
Hearing Date: **12/14/2022**  
Judge: **Michael B. Kaplan**

**ORDER FOR DAMAGES RELATED TO  
VIOLATIONS OF THE AUTOMATIC STAY**

The relief set forth on the following page is hereby **ORDERED**.

This matter was presented to the Court by the Debtor on a motion for damages for violations of the automatic stay and for good cause shown, it is hereby

**ORDERED** that JCP&L shall be ordered to pay Debtor's counsel fees of \$900.00 plus punitive damages payable to the Debtor in the amount of \$\_\_\_\_\_.